

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

PEDRO WILSON HERNANDEZ-
CASTILLO, a/k/a Ramon Perez,

Defendant

) Criminal No. 20-cr-40050-TSH
)
) Violations:
)
) Count One: Unlawful Reentry of Deported Alien
) (8 U.S.C. § 1326)
)
) Count Two: False Representation of Social
) Security Number
) (42 U.S.C. § 408(a)(7)(B))
)
) Count Three: Aggravated Identity Theft
) (18 U.S.C. § 1028A(a)(1))
)

SUPERSEDING INDICTMENT

COUNT ONE

Unlawful Reentry of Deported Alien
(8 U.S.C. § 1326)

The Grand Jury charges that:

On or about June 15, 2020, in Worcester, in the District of Massachusetts, the defendant,

PEDRO WILSON HERNANDEZ-CASTILLO, a/k/a Ramon Perez,

being an alien and having been excluded, removed, and deported from the United States on or
about August 21, 2018, was found in the United States without having received the express consent
of the Secretary of the Department of Homeland Security to reapply for admission to the United
States.

All in violation of Title 8, United States Code, Sections 1326(a) and (b), and Title 6, United
States Code, Sections 202(3) and (4), and 557.

COUNT TWO

False Representation of Social Security Number
(42 U.S.C. § 408(a)(7)(B))

The Grand Jury further charges:

On or about June 15, 2020, in Worcester, in the District of Massachusetts, the defendant,

PEDRO WILSON HERNANDEZ-CASTILLO, a/k/a Ramon Perez,

for the purpose of obtaining anything of value from any person, and for any other purpose, did,
with intent to deceive, falsely represent a number to be the social security account number assigned
by the Commissioner of Social Security to him on a Social Security card, when in fact such number
is not the social security account number assigned by the Commissioner of Social Security to him.

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT THREE
Aggravated Identity Theft
(18 U.S.C. § 1028A(a)(1))

The Grand Jury further charges:

On or about June 15, 2020, in Worcester, in the District of Massachusetts, the defendant,

PEDRO WILSON HERNANDEZ-CASTILLO, a/k/a Ramon Perez,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of
another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c),
that is, False Representation of a Social Security Number, as charged in Count Two.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

A TRUE BILL


FOREPERSON



LUCY SUN
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: FEBRUARY 11, 2021
Returned into the District Court by the Grand Jurors and filed.

/s/ Dawn M. King 1:37pm
DEPUTY CLERK